

# 24 Month Restriction on Suboxone/Subutex: Questions and Answers

**Question:** Is Suboxone covered by MaineCare for anything other than opioid addiction?

**Answer:** No, Suboxone treatment is not allowed by MaineCare for anything but addiction or dependency. For example, you cannot prescribe Suboxone for anxiety.

**Question:** Does the Suboxone 24 month limit mean 24 months in a MaineCare member's lifetime?

**Answer:** Yes, the 24 months is a lifetime limit.

**Question:** What will happen after the MaineCare member reaches their 24 months of treatment?

**Answer:** The MaineCare member needs a Prior Authorization (PA) to continue with Suboxone once they reach the 24 month limit. PA criteria will be listed on the Preferred Drug List (PDL) so providers can see if a member meets medical necessity for treatment. If no PA request is completed, the prescription will be denied at the time of the next refill.

**Question:** What happens for members who reach the 24 month limit on January 1<sup>st</sup> and the Suboxone prescriber hasn't submitted a PA request or discussed a tapering program yet?

**Answer:** If no PA has been submitted when the prescription following the member's 24 month limit is due to be filled, then that prescription will be denied by MaineCare. If the PA is denied and tapering off the medication has been attempted in the past, an explanation must be provided and a plan to taper described on the PA request.

**Question:** Does the 24 month limit to Suboxone treatment include Subutex and their generics?

**Answer:** Yes, the new limits apply to Subutex and Suboxone, as well as their generics.

**Question:** Are pregnant women subject to 24 month limits?

**Answer:** Pregnant women will still need a PA request, but will be granted automatic approval.

**Question:** How will providers know that the member has reached their 24 month limit?

**Answer:** MaineCare will notify providers and members in writing when they reach the 21<sup>st</sup> month mark so they can plan accordingly.

**Question:** How will the new limits affect those receiving both Medicare and MaineCare (duals)?

**Answer:** If the member has Medicare as the primary insurance, MaineCare will follow Medicare's requirements unless the service is not covered by MaineCare. If the service is not covered by MaineCare, then MaineCare will not pay for the service.

**Question:** Does the 24 month time limit include inpatient services?

**Answer:** No, inpatient services will not count in the calculation for the 24 month limit.

**Question:** If the member received PA for Suboxone treatment with one provider, and then changes providers, will the new provider need to submit a new PA request to MaineCare?

**Answer:** No, the PA request will follow the member. Once the six month PA has expired, the new provider will need to complete a PA request for that member.

**Question:** If a member is discharged for noncompliance, will he/she be able to go to another provider for Suboxone treatment?

**Answer:** If a patient is discharged from a provider's care due to noncompliance, he/she can seek treatment from another provider, but the new provider will need to complete the PA process. The provider will need to list examples of how the treatment is medically necessary.

**Question:** Will the 24 month count begin January 1, 2013 or will the count be retroactive?

**Answer:** Anyone having 24 months or more of MaineCare coverage of Suboxone therapy in their lifetime will need to complete the PA process to continue treatment.

**Question:** If a member has multiple health care providers (PCP, counselor, etc.) who completes the PA request?

**Answer:** The Suboxone prescriber is responsible for signing the PA request form.

**Question:** Will PA forms have to be completed every six months?

**Answer:** The PA is a six month approval. The Suboxone prescriber will have to complete a PA every six months in order for the member to continue Suboxone treatment.

**Question:** Who approves the Suboxone PA once a provider completes it?

**Answer:** Gould Health Systems (GHS) processes all pharmacy PAs.

**Question:** Since the new Suboxone time limit begins on January 1, 2013, how soon can providers apply for PA for those who will have met the time limit by the 1<sup>st</sup>?

**Answer:** You should apply for the PA in December 2012 and allow time for review and to notify all parties of the decision.

**Question:** What should the frequency of counseling be for a patient that needs to work with a counselor?

**Answer:** It depends on the patient and the area the patient lives. The rule is vague because of access to the services and limited resources in the area.

**Question:** Who will receive the PA denial?

**Answer:** The member, PA form submitter (Suboxone prescriber), and pharmacy will all receive the denial.

**Question:** What happens if a patient's PA is denied by MaineCare?

**Answer:** There will be a transition period (called the taper period). The provider and member will work together to design a tapering plan for up to three months. At the end of the three months MaineCare will no longer cover the Suboxone prescription.

**Question:** If the PA is denied, will a smaller dose of the prescription be allowed?

**Answer:** Yes, the denial will include an authorization for a smaller dose for tapering off the medication.

**Question:** Will the medication during the taper period be covered by MaineCare?

**Answer:** Yes, the medication will still be covered during the taper period to allow safe patient transition off the treatment.

**Question:** When will the taper period begin?

**Answer:** The taper period will begin on the date of PA denial letter from MaineCare.

**Question:** The PA form lists categories where providers can list member responsiveness or improvement. "Spiritual" is one of the categories, what is this category referring to?

**Answer:** MaineCare is looking for improvement in social, religious, and community involvement with the "Spiritual" category. You could describe the patient's frequency of participation in Narcotics Anonymous or group therapy and/or participation in community activities, church involvement, and other social activities.

**Question:** If the behavioral health provider refuses share information with the Primary Care Provider (PCP) who prescribes the Suboxone medication, how can we obtain information such as if the patient has attended counseling appointments to complete the PA form?

**Answer:** Counseling information is important when completing the PA process for Suboxone treatment. Behavioral health providers will need to share minimal information such as if the patient is attending his/her appointments. The PCP cannot complete the PA process without the necessary information; behavioral health providers will not continue to be reimbursed for the Suboxone related therapy by MaineCare if the PA form is not completed. One provider suggested the member sign a release form with you so you can get that information.

**Question:** What will be the PA decision if the patient is highly functional and has returned to fully functional life but is unwilling to participate in counseling?

**Answer:** You can try to work with the patient by asking him/her to give you a counseling schedule they feel they can keep (for example, monthly as opposed to weekly). For the PA process, you will need to provide details explaining how the member's functioning is impaired when he/she tries to taper off the medication.

**Question:** Will pharmacies receive the PA denial reason for a member?

**Answer:** The denial reason will state that the member has exceeded their lifetime Suboxone limit.

**Question:** Which health care provider will receive notice of the PA decision?

**Answer:** The prescriber who completed the PA request will receive the PA decision.

**Question:** If someone has been receiving Methadone treatment for four years and recently switched to Suboxone, do they have 24 months of Suboxone coverage or does the Methadone and Suboxone therapy count together?

**Answer:** MaineCare will not count Methadone treatment time restrictions against Suboxone treatment time restrictions and vice versa. Members are allowed coverage for 24 months of each. The provider and patient might decide that instead of moving forward with a PA request to demonstrate medical necessity to continue beyond 24 months, to change the treatment a different medication and treat this patient with that medication for 24 months before PA or taper period is required for that patient.

**Question:** Can a member pay out of pocket for the Suboxone medication? Will the member lose their MaineCare coverage if they pay for Suboxone out of pocket?

**Answer:** A member can pay for the Suboxone medication out of pocket and he/she will not lose their MaineCare coverage, but it is still the Suboxone prescriber's responsibility to determine if the treatment is appropriate for that patient.

**Question:** If the member tapers, but then relapses and the 24 month limit has been reached, what do providers do?

**Answer:** A new PA can be requested when they are going back to the treatment. There will be a separate PA form for members who relapse within the 1<sup>st</sup> year. If they relapse after one year, a different PA form will be used.

**Question:** If a member's Suboxone PA is denied because they are not showing enough improvement and within the three month taper process the member relapses (within a year), what are the options?

**Answer:** If a Suboxone PA is denied because they are not showing enough improvement then Suboxone is not the right treatment for this patient. You will need to discuss other treatment options. If this patient has not reached the 24 month lifetime limit for Methadone, maybe that is a treatment option for him/her.

**Question:** If the PA request is denied by MaineCare, can the provider complete a second request?

**Answer:** You can appeal the request if you believe you can show medical necessity. If the PA request is denied, you and the patient should discuss other treatment options. If the patient has shown improvement, a new PA request can be submitted at any time, but the provider will have to make appropriate justifications to show medical necessity on the PA form.

**Question:** Is Vivitrol included in this 24 month limit policy?

**Answer:** No, Vivitrol is not counted in the 24 month limit, but if the patient is receiving Vivitrol treatment, you should include that information on the PA form.